

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

**In re:**

**Red River Subs, Inc**

**Bankr. No. 24-30010**

***dba Erbert and Gerbert's - Fargo***  
***dba Erbert and Gerbert's - Bismarck***  
***dba Erbert and Gerbert's - Moorhead***

**Chapter 11**

**Debtor.**

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**MOTION TO APPEAR BY TELEPHONE**

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Sarah J. Wencil, Trial Attorney for the U.S. Trustee, respectively moves this Court to enter an order under Local Rule 5001-1 allowing counsel to appear by telephone on Friday, February 9, 2024, at 10:00 a.m. on the final hearings: Motion to Pay Certain Prepetition Employee Wages (Doc. 5); Motion to Reject Office Lease (Doc. 6); Motion to Pay Critical Vendors (Doc.9); Motion to Use Cash Collateral (Doc. 10).

1. The U.S. Trustee has no objections to the relief requested. The U.S. Trustee does not anticipate submitting exhibits or examining witnesses.

2. Travel to Fargo, North Dakota would be unduly burdensome and expensive.

WHEREFORE, Counsel requests that the United States Trustee be allowed to appear by telephone.

Dated: February 7, 2024

MARY R. JENSEN  
ACTING U.S. TRUSTEE REGION 12

/s/ Sarah J. Wencil  
Sarah J. Wencil  
Office of the U.S. Trustee  
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300 South Fourth St.  
Minneapolis, MN 55415  
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**CERTIFICATE OF SERVICE**

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Sarah J. Wencil, an employee of the U.S. Trustee office, hereby certifies the filing of this document caused service via CM/ECF upon all CM/ECF recipients.

Dated: February 7, 2024

/s/ Sarah J. Wencil  
Sarah J. Wencil